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Attorneys for Plaintiff Eric Schiermeyer

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

ERIC SCHIERMEYER, Derivatively on Behalf
of Nominal Defendant, BLOCKCHAIN GAME
PARTNERS, INC. D/B/A GALA GAMES,

Plaintiff,

vs.

WRIGHT W. THURSTON and TRUE NORTH
UNITED INVESTMENTS, LLC

Defendants.

and

BLOCKCHAIN GAME PARTNERS, INC.
D/B/A BGP GAMES,

Nominal Defendant.

**STIPULATED MOTION TO EXTEND
TIME TO RESPOND TO: (1)
DEFENDANT’S MOTION FOR A
PRELIMINARY INJUNCTION; (2)
PLAINTIFF’S MOTION TO DISMISS
COUNTERCLAIMS; AND (3)
CROSSCLAIM DEFENDANT’S
MOTION TO COMPEL ARBITRATION
OR DISMISS CROSSCLAIMS**

Case No. 2:23-cv-00589-HCN-DAO

The Honorable Howard C. Nielson, Jr.

Magistrate Judge Daphne A. Oberg

<p>TRUE NORTH UNITED INVESTMENTS, LLC, Derivatively on Behalf of Nominal Defendant, BLOCKCHAIN GAME PARTNERS, INC. D/B/A GALA GAMES,</p> <p style="text-align: center;">Counterclaimant,</p> <p style="text-align: center;">vs.</p> <p>ERIC SCHIERMEYER,</p> <p style="text-align: center;">Counterdefendant,</p> <p style="text-align: center;">and</p> <p>BLOCKCHAIN GAME PARTNERS, INC. D/B/A BGP GAMES,</p> <p style="text-align: center;">Nominal Counterdefendant.</p>	
<p>TRUE NORTH UNITED INVESTMENTS, LLC,</p> <p style="text-align: center;">Crossclaim Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>BLOCKCHAIN GAME PARTNERS, INC. D/B/A BGP GAMES,</p> <p style="text-align: center;">Crossclaim Defendant</p>	

All parties, through their respective counsel and pursuant to Federal Rule of Civil Procedure 6(b) and DUCivR 7-1(a)(5) hereby stipulate and move this Court to extend the deadlines for the parties to respond to: (1) Counterclaim Plaintiffs’ Motion for an Injunction Ordering the Temporary Appointment of a Custodian to Act as President, CEO and the Sole Director of Blockchain Game Partners, Inc. (“Motion for Preliminary Injunction,” Dkt. 88); (2) Blockchain

Game Partners, Inc.’s Motion to Dismiss to Compel Arbitration, or in the Alternative, to Dismiss True North’s Amended Crossclaim (“Motion to Dismiss Crossclaims,” Dkt. 89); and (3) Plaintiff’s Motion to Dismiss Counterclaims (Dkt. 90). The parties request that the deadlines for the responses to each of these motions be extended to **February 2, 2024**.

In order to avoid a waste of party and judicial resources, Plaintiff suggests that his Motion to Dismiss Counterclaims should be decided before the Motion for Preliminary Injunction (based on those counterclaims) is addressed. Defendants disagree and suggest that all pending motions should be addressed simultaneously. The parties hope to resolve sequencing of the motions at the scheduling conference scheduled for January 9, 2024 at 2:00 p.m.

Plaintiff has filed a proposed order concurrently with this stipulated motion.

DATED this 22nd day of December, 2023.

SNELL & WILMER L.L.P.

/s/ Paul W. Shakespear

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and True North United Investments, LLC*

**signed with permission via email*

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